



April 14, 2004

Ms. Christy Brown, RCRA Project Manager  
United States EPA, Region 10  
Mail Stop WCM-126  
1200 Sixth Avenue  
Seattle, WA 98101

Re: Excavation of Ditch Material – Revised Approach  
J.H. Baxter & Co. Arlington, Washington facility  
AOC Docket No. RCRA-10-2001-0086  
EPA ID #: WAD 05382 3019

Dear Ms. Brown:

As we have previously discussed, J.H. Baxter & Co. (Baxter) plans to excavate material from two ditches at the Arlington Wood Treating Facility as part of the planned Stormwater Improvement Measures. On June 27, 2003, we sent a letter to you discussing our plans to excavate the ditch material and use it as structural fill. Upon further evaluation and discussions with you, we have decided to dispose of the ditch material at an offsite facility. The following sections outline our approach for excavation and disposal of ditch material.

### Background

The purpose of this improvement measure is to remove material with low levels of site-related chemicals from Ditch 1 and Ditch 2. The activities associated with the ditch excavation will be conducted under the provisions of Paragraph 63 of the Administrative Order on Consent (AOC) regarding other work at the facility.

Material within Ditches 1 & 2 includes eroded soil and rock ditch base material and is collectively identified as ditch material. Current plans call for excavation of ditch material from Ditch 1 and Ditch 2 as shown on the attached Figure 1. Baxter has sampled the material in these ditches as part of the Site Investigation and the results are summarized on Figure 1. Sampling results indicate that pentachlorophenol (PCP) concentrations range from 1.9 mg/kg to 11 mg/kg, with the highest concentrations just slightly above the United States Environmental Protection Agency's (EPA) Region IX's Preliminary Remediation Goal (PRG) of 9 mg/kg for direct contact with soil.

Synthetic Leaching Precipitation Procedure (SPLP) testing was conducted on a sample of the ditch material to evaluate the potential of PCP leaching. The results of the SPLP testing ranged from 0.820 µg/L to 4.0 µg/L, indicating the low potential for PCP to leach from the ditch material.



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In addition, concentrations of diesel-range organics were detected in the soils. These concentrations ranged from 140 mg/kg to 2,100 mg/kg.

### **Excavation Approach**

We anticipate conducting excavation activities during a period of dry weather. However, any remaining water in the ditches will be removed and treated using the pilot treatment system. Treated water will be discharged in accordance with the Ecology approved interim stormwater treatment protocols.

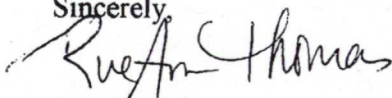
The ditch material will be excavated from the entire lengths of Ditches 1 & 2. The material will be excavated using a backhoe or similar excavation equipment to approximately six inches below the geotextile base fabric that is present in the ditches. The backhoe will place the excavated material directly into a dump truck and it will be transported to a plastic-lined and bermed area for material management purposes (Figure 1). If necessary, inert dry material (i.e., dry clean soil, diatomaceous earth, or cement) will be added to the excavated material to absorb any free liquids. The excavated ditch material will be temporarily covered with plastic.

### **Disposal**

A single sample of the excavated material will be collected for laboratory analysis and profiling. Following final acceptance of the waste profile and preparation of shipping manifests, the ditch material will be loaded into trucks for shipment to Waste Management's Subtitle C disposal facility in Arlington, Oregon for appropriate treatment and/or disposal.

We would appreciate your written approval of these activities at your earliest convenience. If you have any questions, please do not hesitate to call me at (541) 689-3801.

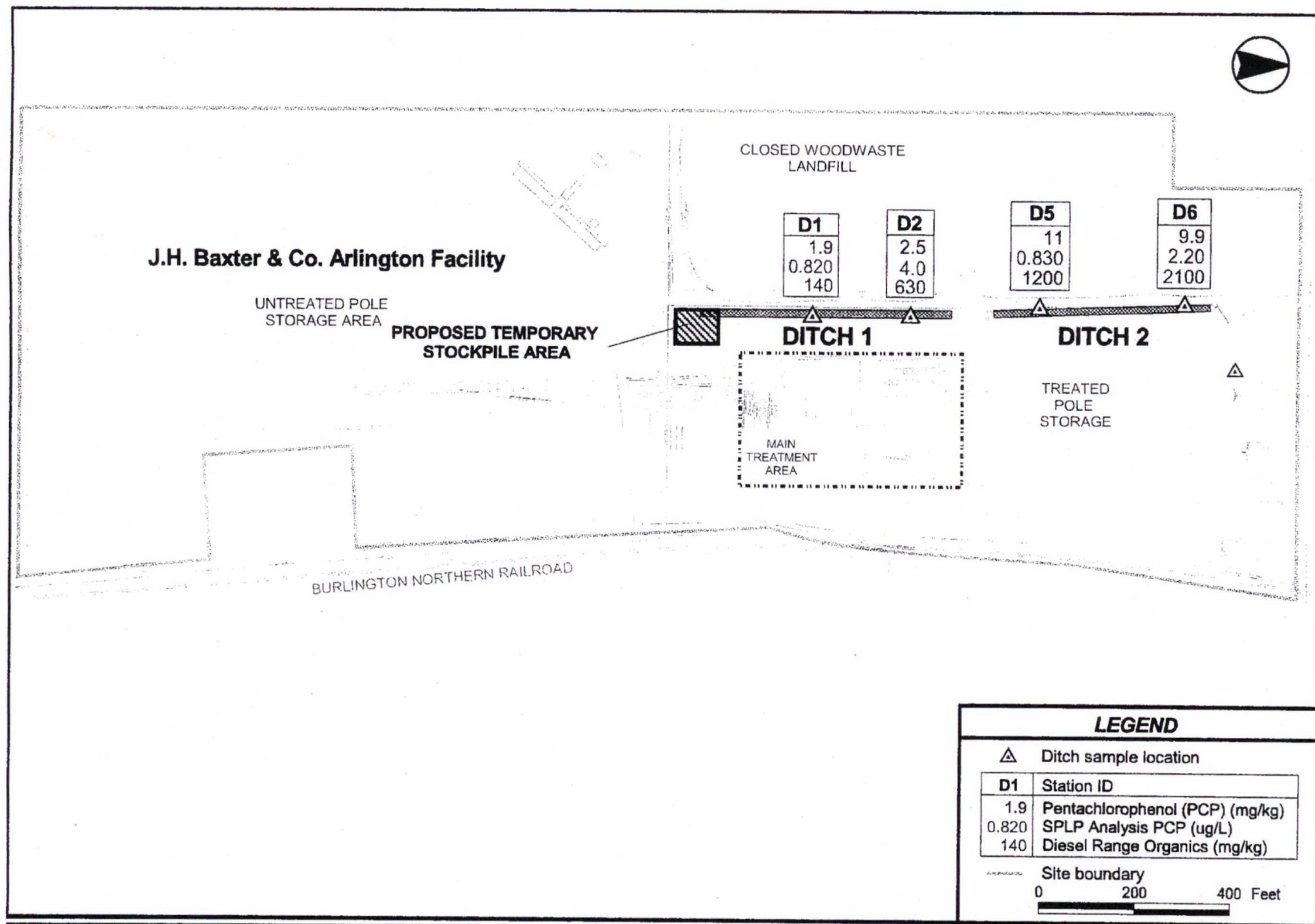
Sincerely,



RueAnn Thomas  
Environmental Programs Director

cc: Jeanne Tran, Department of Ecology  
Georgia Baxter, J.H. Baxter & Co.  
Mary Larson, J.H. Baxter & Co.  
Norm Kennel, Premier Environmental Services, Inc.

enclosure



**Figure 1. Ditch Material Excavation Area and Sediment Concentrations - Arlington, WA**

